



P.O. Box 2301
Cincinnati, OH 45201-2301

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D. C. 20554

DOCKET FILE COPY ORIGINAL

In the Matter of:

Interconnection Between Local Exchange Carriers
and Commercial Mobile Radio Providers

)

CC Docket No. 95-185

)

)

Equal Access and Interconnection Obligations
Pertaining to Commercial Mobile Radio Service

)

CC Docket No. 94-54

)

Dear Mr. Caton:

Enclosed are an original and nine copies of the Comments of Cincinnati Bell Telephone in the above referenced proceeding. A duplicate original copy of this letter and attached Comments is also provided. Please date stamp this as acknowledgment of its receipt and return it. Questions regarding these Comments may be directed to Ms. Patricia Rupich at the above address or by telephone on (513) 397-6671.

Sincerely,

David L. Meier

David L. Meier
Director - Legislative &
Regulatory Planning

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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OFFICE OF SECRETARY

In the Matter of)
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Interconnection Between Local Exchange) CC Docket No. 95-185
Carriers and Commercial Mobile Radio)
Service Providers)

COMMENTS

I. Introduction

On January 11, 1996, the Commission released a Notice of Proposed Rulemaking ("NPRM") in this docket.¹ The NPRM seeks comment on numerous issues relating to interconnection between local exchange carriers ("LECs") and commercial mobile radio service ("CMRS") providers. Cincinnati Bell Telephone Company ("CBT"), an independent, mid-size local exchange carrier, would be affected by any rules governing interconnection between LECs and CMRS providers. CBT offers its comments on the most significant issue raised in the NPRM, the Commission's tentative conclusion that interconnection rates for local switching facilities and connections to end users should be priced on a "bill and keep"² basis. (NPRM at para. 3.) CBT hereinafter demonstrates that the bill and keep system should not be adopted as Commission policy, even on an interim basis.

The Commission's tentative conclusion that a bill and keep arrangement is the best solution with respect to terminating access from LEC end offices to LEC subscribers, and with

¹Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers, Notice of Proposed Rulemaking, CC Docket No. 95-185, FCC 95-505, released January 11, 1996.

²The Commission defines "bill and keep" to mean both the LEC and the CMRS provider charge a rate of zero for terminating traffic. NPRM at para. 3.

respect to terminating access from equivalent CMRS facilities to CMRS subscribers, is fundamentally flawed. As discussed below, neither justification for bill and keep -- equal traffic flows or *de minimis* interconnection costs -- is present with LEC-CMRS interconnection. Adopting bill and keep would provide no benefit to consumers; rather, it would amount to a huge, unjustified subsidy to CMRS providers at the expense of LEC subscribers. Furthermore, bill and keep is not needed to encourage the development of commercial mobile radio services. The CMRS industry has enjoyed phenomenal growth under the current system of negotiated interconnection arrangements. The current system has provided reasonable, nondiscriminatory and flexible interconnection arrangements for cellular providers, and there is no reason to believe that new market entrants will be unable to obtain similarly beneficial arrangements.

II. The Current System of Negotiated Interconnection Agreements Should be Retained

Interconnection arrangements with CMRS providers are currently established on the basis of individually negotiated contracts. In accordance with prior Commission orders, LECs are already obligated to provide the type of interconnection reasonably requested by the CMRS provider at reasonable rates and on reasonable, nondiscriminatory terms and conditions. This system has successfully provided cellular carriers with the flexibility to structure interconnection arrangements that meet their individual needs. The Commission has noted that "most LECs, AT&T, and established cellular carriers, as well as some SMR, paging and PCS providers, support the existing requirement that LECs engage in good faith negotiations over interconnection with CMRS providers." (NPRM at para. 83.) The cellular carriers also maintain that the current process has provided "adequate protection against LEC discriminatory conduct." (NPRM at para. 83.) Current CMRS providers are satisfied with negotiated

interconnection arrangements. There is no evidence that new CMRS entrants will not be able to obtain equally beneficial arrangements.³

A. Existing Safeguards Are Adequate to Protect CMRS Providers

The CMRS Second Report⁴ created a system under which each carrier is compensated for the reasonable costs it incurs for terminating traffic which originates on the other's facilities. Pursuant to the Interconnection Order⁵ and the CMRS Second Report, LECs are required to provide the type of interconnection reasonably requested by the CMRS provider at reasonable rates and on reasonable, nondiscriminatory terms and conditions. In addition to the Commission's requirements, many states have instituted safeguards to ensure that CMRS providers obtain satisfactory interconnection arrangements. For example, CBT's interconnection agreements are filed with the Public Utilities Commission of Ohio ("PUCO").⁶ These agreements are available for public inspection. Any new CMRS entrant, therefore, can obtain substantial, meaningful information about CBT's interconnection arrangements with other CMRS providers and can plan its interconnection negotiations accordingly. In addition, the complaint

³CMRS providers will likely argue that without the threat of bill and keep, LECs will have no incentive to negotiate reasonable interconnection arrangements. As discussed herein, however, LECs are required by existing Commission rules to negotiate in good faith with CMRS providers. The existing rules have worked well and should not be replaced by bill and keep.

⁴Implementation of Sections 3(n) and 332 of the Communications Act; Regulatory Treatment of Mobile Services, Second Report and Order, GN Docket No. 93-252, 9 FCC Rcd 1411 (1994).

⁵Need to Promote Competition and Efficient Use of Spectrum for Radio Common Carrier Services, Declaratory Ruling, 2 FCC Rcd 2910 (1987).

⁶CBT notes that Section 252(a)(1) of the Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996), provides for the filing of negotiated interconnection agreements with state commissions. The Act demonstrates a preference for negotiated arrangements with state commission oversight.

process under Sections 208 and 312 of the Communications Act is always available if a CMRS provider believes that a LEC is not negotiating in good faith.⁷ Finally, the state commissions can, and are in a better position to, address CMRS providers' concerns regarding interconnection with LECs. In light of the success of the current system, and the existing safeguards for CMRS providers, further regulatory intervention in this area is not needed.

B. Bill and Keep is Inappropriate

CBT offers interconnection to CMRS providers under the same basic rates and structure as interconnection offered to other access customers. The minutes of use rate is based upon CBT's interstate access rate for switching and the flat rates for dedicated transport facilities are based upon CBT's interstate access rates for dedicated transport facilities. CMRS providers have negotiated with CBT for a discount off CBT's tariffed dedicated transport rates based on the estimated percentage of traffic that terminates on CMRS providers' facilities. This uniform discount is intended to compensate CMRS providers for costs incurred in terminating traffic that originated on CBT's network. CBT offers reasonable, nondiscriminatory rates to existing CMRS providers. In accordance with the Commission's requirements, CBT will continue to offer nondiscriminatory rates and rate structures to new CMRS entrants.

CBT's basic rate structure for LEC-CMRS interconnection recognizes that both the LEC and the CMRS provider incur costs for terminating traffic from the other's network. A bill and keep arrangement, however, ignores those costs. As the Commission recognizes, bill and keep makes sense only if either of two conditions is met: (1) traffic is balanced in each direction, or

⁷CBT is not aware of any formal complaints filed against it by CMRS providers seeking interconnection with CBT. The lack of complaints is strong evidence that CMRS providers are satisfied with the current system and that further regulatory intervention is unnecessary.

(2) actual interconnection costs are so low that there is little difference between a cost-based rate and a zero rate. (NPRM at para. 61.) Neither condition is satisfied as applied to LEC-CMRS interconnection. There is no question that traffic flows between LECs and CMRS providers are substantially imbalanced. CBT estimates that between 80% and 90% of the wireless calls in its territory terminate on CBT's network. In addition, CBT's interconnection costs are not close to zero. CBT's cost-based interconnection rates are low, but there are tens of millions of minutes of use per year and interconnection with CMRS providers is a significant source of revenue for CBT. If this rate is replaced by a zero rate, as the Commission proposes, CBT will not be able to recover its costs from CMRS providers. Bill and keep would create a huge subsidy in favor of CMRS providers at the expense of LEC subscribers, because LECs would be forced to seek recovery of the cost of bill and keep from their subscribers.⁸

In addition to creating an unfair subsidy in favor of CMRS providers, bill and keep creates undesirable economic incentives. Rather than encouraging efficiency, bill and keep would merely create incentives for CMRS providers to maximize the opportunity to bill and keep. This incentive may discourage investment in network construction and encourage CMRS providers to seek out customers likely to originate more calls than they receive. Bill and keep

⁸CBT recognizes that the Commission is suggesting bill and keep as an interim measure only. However, once the bill and keep subsidy is in place, and CMRS providers become used to its substantial benefits, they may be reluctant to move to a more appropriate cost-based arrangement at the conclusion of the interim period. Without evidence of a problem with the current system of negotiated interconnection arrangements, it is better not to create the subsidy in the first place.

also would encourage inefficient entry into the marketplace by sending signals to potential market entrants that are not cost-based. None of these outcomes is in the public interest.

C. Interference in the Market is Unwarranted

The Commission's primary concern in releasing the NPRM is "that existing general interconnection policies may not do enough to encourage the development of CMRS" (NPRM at para. 2.) The Commission's concern is not well founded. The market for CMRS service continues to develop rapidly.⁹ CBT is not aware of any, and the Commission cites no, evidence that LEC-CMRS interconnection arrangements are hindering the development of CMRS services or the ability of these services to compete with wireline telecommunications services. Indeed, the various Commission initiatives for spectrum allocation will likely create even more demand for wireless services.

Because of the minutes of use involved, interconnection charges are a significant source of LEC revenue. However, interconnection charges are a small portion of the retail price of CMRS service,¹⁰ and there is no evidence that interconnection charges are a barrier to entry into the CMRS market. As existing barriers are reduced or removed,¹¹ CMRS services are rapidly

⁹From December 1993 to December 1994, cellular subscribership grew by more than 50%. Strategic Policy Research, Bill-and-Keep: A Bad Solution to a Non-Problem, citing, CTIA, Wireless Factbook (Spring 1995), at 7-8. A recent publication reports that the research firm International Data Corp. estimates a 35% annual growth rate in the customer base for wireless communications over the next five years. Investor's Business Daily, February 23, 1996, at A4.

¹⁰CBT estimates that interconnection charges are approximately 5% of the average prevailing retail price of cellular service in CBT's operating territory.

¹¹Such barriers include spectrum availability, charges for cellular air time, and technical limitations on cellular phones.

becoming *bona fide* alternatives to LEC-provided wireline service.¹² The substantial growth of CMRS services has occurred in the context of individually negotiated interconnection arrangements consistent with the Commission's requirements in the CMRS Second Report and the Interconnection Order. In light of this record, CBT respectfully submits that there is no problem that needs to be solved. The Commission's current policies are working effectively and no changes are needed.

III. Enactment of the Telecommunications Act of 1996 Makes Action on CMRS Interconnection Unnecessary At This Time

The Commission has requested comment on the implications of the recently enacted Telecommunications Act of 1996 on the Commission's proposals in the NPRM.¹³ The Telecommunications Act of 1996 requires the Commission, within the next six months, to establish regulations implementing the Act's requirements regarding interconnection between telecommunications networks.¹⁴ Nothing in the Act appears to exclude LEC-CMRS interconnection from its coverage. Indeed, the Act's clear preference for negotiated interconnection arrangements with state commission oversight amounts to a congressional endorsement of the current system. Without sufficient evidence that the current system of negotiated interconnection arrangements is unsatisfactory, the Commission should refrain from

¹²Indeed, the Commission has recently proposed rules permitting broadband CMRS providers to offer the equivalent of local exchange service using existing allocations for PCS, cellular and SMR. Amendment of the Commission's Rules To Permit Flexible Service Offerings in the Commercial Mobile Radio Services, Notice of Proposed Rule Making, WT Docket No. 96-6, FCC 96-17, released January 25, 1996.

¹³Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers, Order and Supplemental Notice of Proposed Rulemaking, CC Docket No. 95-185, FCC 96-61, released February 16, 1996, at para. 6.

¹⁴Telecommunications Act of 1996, Section 251(d).

implementing bill and keep, or any other interim measures affecting LEC-CMRS interconnection. LEC-CMRS interconnection is more properly addressed in the proceedings resulting from the new Act or in the context of the comprehensive access reform and interconnection proceeding which the Commission will soon commence.¹⁵

IV. Conclusion


For the reasons stated herein, CBT urges the Commission not to mandate bill and keep as the compensation method between LECs and CMRS providers, even on an interim basis. The current system of negotiated interconnection agreements is satisfactory. Furthermore, neither of the conditions justifying bill and keep is met. Traffic flows are not equal and LEC interconnection costs are not almost zero. Bill and keep would not benefit the majority of consumers and would not be in the public interest. It would result in an unjustifiable subsidy for CMRS providers at the expense of LEC subscribers. Furthermore, the Commission should refrain from adopting any interim rules in this docket. Rather, the issue of LEC-CMRS

¹⁵See NPRM at para. 17.

interconnection should be addressed either in the interconnection proceedings resulting from the Telecommunications Act of 1996 or in the Commission's access reform proceeding.

Respectfully submitted,

FROST & JACOBS

By: 
William D. Baskett III
Thomas E. Taylor
David S. Bence

2500 PNC Center
201 East Fifth Street
Cincinnati, Ohio 45201-5715
(513) 651-6800

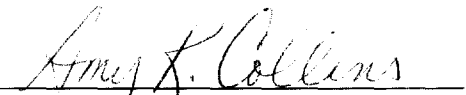
Attorneys for Cincinnati Bell
Telephone Company

Dated: March 4, 1996

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that copies of the foregoing **Comments of Cincinnati Bell Telephone Company** have been delivered by first class United States Mail, postage prepaid, on March 4, 1996, to the persons on the attached service list.



Amy K. Collins

William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

Judith Argentieri
Wireless Telecomm. Bureau, Police Division
Federal Communications Commission
1919 M Street, N.W., Room 644
Washington, DC 20554

Barbara Esbin
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 518
Washington, DC 20554

Janice Myles
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 544
Washington, DC 20554

Michele Farquhar
Wireless Telecommunications Bureau
Federal Communications Bureau
2025 M Street, N.W., Room 5002
Washington, DC 20554

Dan Phythyon
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, N.W., Room 5002
Washington, DC 20554

Gregory Rosson
Office of Plans and Policy
Federal Communications Commission
1919 M Street, N.W., Room 822
Washington, DC 20554

International Transcription Service
2100 M Street, N.W., Suite 140
Washington, DC 20036

Pamela Riley
AirTouch Communications
425 Market Street
San Francisco, CA 94105

David A. Gross
Kathleen Q. Abernathy
AirTouch Communications
1818 N. Street, N.W.
Washington, DC 20036

Roy L. Morris
Allnet Communications Services, Inc.
1990 M Street, N.W., Suite 500
Washington, DC 20036

Diane Smith
ALLTEL
655 15th Street, N.W., Suite 220
Washington, DC 20005

Anne V. Phillips
American Personal Communications
1025 Connecticut Avenue, N.W.
Washington, DC 20036

Michael S. Pabian
Ameritech
2000 W. Ameritech Center Dr., Room 41176
Hoffman Estates, IL 60196

Lon C. Levin
AMSC Subsidiary Corporation
10802 Parkridge Boulevard
Reston, VA 22091

Albert M. Lewis
Clifford K. Williams
AT&T
295 North Maple Avenue, Room 2255F2
Basking Ridge, NJ 07920

Mark C. Rosenblum
Robert J. McKee
AT&T
295 North Maple Avenue, Room 2255F2
Basking Ridge, NJ 07920

Ernest T. Sanchez
Baker & McKenzie
815 Connecticut Avenue, N.W., Suite 900
Washington, DC 20006

John M. Goodman
Bell Atlantic
1320 North Courthouse Road, 8th Floor
Arlington, VA 22201

William L. Roughton, Jr.
Bell Atlantic
1310 North Courthouse Road
Arlington, VA 22201

S. Mark Tuller
Bell Atlantic
180 Washington Valley Road
Bedminster, NJ 07921

William B. Barfield
Jim O. Llewellyn
BellSouth
1155 Peachtree Street, N.E.
Atlanta, Ga 30309

Carl W. Northrop
Bryan Cave
700 13th Street, N.W.
Washington, DC 20005

Michael F. Altschul
Randall S. Coleman
Cellular Telecommunications Industry Association
1250 Connecticut Avenue, N.W., Suite 200
Washington, DC 20036

W. Bruce Hanks
Century Cellunet, Inc.
100 Century Park Avenue
Monroe, LA 71203

R. Bruce Easter, Jr.
Claircom Communications Group
701 Pennsylvania Avenue, N.W., Suite 600
Washington, DC 20004

Joel H. Levy
William B. Wilhelm, Jr.
Cohn and Marks
1333 New Hampshire Avenue, N.W., Suite 600
Washington, DC 20036

John A. Malloy
Columbia PCS, Inc.
201 North Union, Suite 410
Alexandria, VA 22314

John T. Scott, III
Crowell & Moring
1001 Pennsylvania Avenue, N.W.
Washington, DC 20554

Charles P. Featherstun
David G. Richards
1133 21st Street, N.W., Suite 900
Washington, DC 20036

Daniel C. Riker
DCR Communications, Inc.
2715 M Street, N.W.
Washington, DC 20007

Lewis J. Paper
David B. Jepps
Dickstein, Shapiro & Morin
2101 L Street, N.W.
Washington, DC 20037

Werner K. Hatenberger
Laura H. Phillips
Steven F. Morris
Dow, Lohnes & Albertson
1255 23rd Street, N.W., Suite 500
Washington, DC 20037

Leonard J. Kennedy
Laura H. Phillips
Richard S. Denning
Dow, Lohnes & Albertson
1255 23rd Street, N.W. Suite 500
Washington, DC 20037

Joe D. Edge
Richard J. Arsenault
Drinker, Biddle & Reath
901 15th Street, N.W., Suite 900
Washington, DC 20006

Bruce D. Jacobs
Glenn S. Richards
Fisher, Wayland, Cooper, Leader & Zaragoza
2001 Pennsylvania Avenue, N.W., Suite 400
Washington, DC 20006

Russell H. Fox
Susan H.R. Jones
Gardner, Carton & Douglas
1301 K Street, N.W., Suite 900 - East Tower
Washington, DC 20005

Michael S. Hirsch
Geotek Communications, Inc.
1200 19th Street, N.W., Suite 607
Washington, DC 20036

Jonathan L. Wiener
Daniel S. Goldberg
Goldberg, Godles, Wiener & Wright
1229 19th Street, N.W.
Washington, DC 20036

David A. Reams
Grand Broadcasting Corporation
P.O. Box 502
Perrysburg, OH 43552

Emily C. Hewitt
Vincent L. Crivella
GSA
18th & F Streets, N.W., Room 4002
Washington, DC 20405

Michael J. Ettner
Tenley A. Carp
GSA
18th & F Streets N.W., Room 4002
Washington, DC 20405

Andre J. Lachance
Gail L. Polivy
GTE
1850 M Street, N.W., Suite 1200
Washington, DC 20036

Peter A. Rohrbach
Karis A. Hastings
Hogan & Hartson
Columbia Square
555 13th Street, N.W.
Washington, DC 2004

Martin W. Bercovici
Christine M. Gill
Tamara Y. Davis
Keller and Heckman
1001 G Street, N.W., Suite 500 West
Washington, DC 20001

Peter M. Connolly
Koteen & Naftalin
1150 Connecticut Avenue
Washington, DC 20036

Gary M. Epstein
James H. Barker
James F. Rogers
Latham & Watkins
1001 Pennsylvania Avenue, N.W., Suite 1300
Washington, DC 20004

Catherine R. Sloan
LDDS Communications, Inc
1825 Eye Street, N.W., Suite 400
Washington, DC 20006

J. Breck Blalock
Leventhal, Senter & Lerman
2000 K Street, N.W., Suite 600
Washington, DC 20006

David L. Nace
Marci E. Greenstein
Lucas, McGowan, Nace & Gutierrez, Chartered
1111 19th Street, N.W., Suite 1200
Washington, DC 20036

Terry J. Romine
Elizabeth R. Sachs
Lucas, McGowan, Nace & Gutierrez, Chartered
1111 19th Street, N.W., Suite 1200
Washington, DC 20036

Gerald S. McGowan
George L. Lyon, Jr.
John B. Branscome
Lucas, McGowan, Nace & Gutierrez, Chartered
1111 19th Street, N.W., Suite 1200
Washington, DC 20036

Thomas Gutierrez
J. Justin McClure
Lucas, McGowan, Nace & Gutierrez, Chartered
1111 19th Street, N.W., Suite 1200
Washington, DC 20036

Scott K. Morris
McCaw Cellular Communications, Inc.
5400 Carillon Point
Kirkland, WA 98033

Cathleen A. Massey
McCaw Cellular Communications, Inc.
1150 Connecticut Avenue, N.W., 4th Floor
Washington, DC 20036

William J. Sill
Nancy L. Killien
McFadden, Evans & Sill
1627 Eye Street, N.W., Suite 810
Washington, DC 20006

Larry A. Blosser
Donald J. Elardo
MCI
1801 Pennsylvania Avenue, N.W.
Washington, DC 20006

David E. Weisman
Alan S. Tilles
Meyer, Faller, Weisman and Rosenberg
4400 Jenifer Street, N.W., Suite 380
Washington, DC 20015

Howard J. Symons
Christopher J. Harvie
Cherie R. Kiser
Mintz, Levin, Cohn Ferris, Glovsky and Popco, P.C.
701 Pennsylvania Avenue, N.W., Suite 900
Washington, DC 20004

Kenneth E. Hardman
Moir & Hardman
2000 L Street, N.W., Suite 512
Washington, DC 20036

Cheryl Tritt
Morrison & Foerster
2000 Pennsylvania Avenue, N.W.
Washington, DC 20006

Paul Rodgers
Charles D. Gray
James Bradford Ramsay
NARUC
1102 ICC Building
P.O. Box 684
Washington, DC 20044

David Cosson
Steven E. Watkins
National Telephone Cooperative Association
2626 Pennsylvania Avenue, N.W.
Washington, DC 20037

Robert S. Foosaner
Lawrence R. Krevor
Laura L. Holloway
Nextel Communications, Inc.
800 Connecticut Avenue, N.W., Suite 1001
Washington, DC 20006

Penny Rubin
NY DPS
Three Empire State Plaza
Albany, NY 12223

Edward R. Wholl
NYNEX
1111 Westchester Avenue
White Plains, NY 10604

Edward R. Wholl
William J. Balcerski
NYNEX
120 Bloomingdale Road
White Plains, NY 10605

Michael R. Carper
OneComm Corporation
4643 Ulster Street, Suite 500
Denver, CO 80237

Lisa M. Zaina
OPASTCO
21 Dupont Circle, N.W., Suite 700
Washington, DC 20036

David L. Hiull
Audrey P. Rasmussen
O'Conner & Hannan
1919 Pennsylvania Avenue, N.W., Suite 800
Washington, DC 20006

Alan F. Ciamporzero
Pacific Telesis
1275 Pennsylvania Avenue, N.W., 4th Fl.
Washington, DC 20004

James L. Wurtz
Pacific Telesis Mobile Services
1275 Pennsylvania Avenue, N.W.
Washington, DC 20004

Peter Arth, Jr.
Edward W. O'Neill
Ellen S. Levine
People of the State of CA and the PUC of CA
505 Van Ness Avenue
San Francisco, CA 94102

Mark J. Golden
Personal Communications Industry Association
1019 19th Street, N.W.
Washington, DC 20036

Theresa Fenclon
Pillsbury, Madison & Sutro
1667 K Street, N.W., Suite 1100
Washington, DC 20006

John Hearne
Point Communications Company
100 Wilshire Boulevard, Suite 1000
Santa Monica, CA 90401

Deborah Lipoff
Rand McNally & Company
8255 North Central Park
Skokie, IL 60076

Judith St. Ledger-Roty
Paul G. Madison
Reed Smith Shaw & McClau
1200 18th Street, N.W.
Washington, DC 20036

Michael J. Shortley, III
Rochester Telephone Corporation
Rochester Telephone Center
180 South Clinton Avenue
Rochester, NY 14646

Caressa D. Bennet
Rural Cellular Association
2120 L Street, N.W., Suite 520
Washington, DC 20037

Jay L. Birnbaum
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, N.W.
Washington, DC 20005

Thomas J. Casey
Jay L. Birnbaum
David Pawlik
Skadden, Arps, Slate, Mcagher & Flom
1440 New York Avenue, N.W.
Washington, DC 20005

Peter J. Tyrrell
SNET Cellular, Inc.
227 Church Street
New Haven, CT 06510

Peter P. Bassermann
SNET Mobility, Inc.
555 Long Wharf Drive
New haven, CT 06511

Wayne Watts
Carol Tacker
Bruce Beard
Southwestern Bell Mobile Systems
17330 Preston Road, Suite 100A
Dallas, TX 75252

Bruce S. Asay
Union Telephone Company, Inc.
2515 Pioneer Avenue
Cheyenne, WY 82001

Christopher Johnson
Western Wireless Corp.
330 120th Avenue, N.E., Suite 200
Bellevue, WA 98005

James D. Ellis
Mary Marks
Southwestern Bell Corp.
175 H. Houston, Suite 1306
San Antonio, TX 78205

Richard C. Rowleson
Vanguard Cellular Systems, Inc.
2002 Pisgah Church Road, Suite 300
Greensboro, NC 27455

Philip L. Verveer
Melissa F. Newman
Jennifer A. Donaldson
Willkie, Farr & Gallagher
1155 21st Street, N.W., Suite 600
Washington, DC 20036